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October 14, 2016

Arizona Corporation Commission

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Doug Little, Chairman
Bob Burns, Commissioner
Tom Forese, Commissioner
Bob Stump, Commissioner
Andy Tobin, Commissioner
Arizona Corporation Commission

DOCKETED BY

REFERENCE: Docket No. WS-01303A-16-0145

Gentlemen:

I am a retired widow in Sun City. I am opposed to the EPCOR proposal to consolidate waste water rates for the Agua Fria, Anthem, Mohave, Sun City, and Sun City West districts. There are a number of reasons for my opposition, including:

- Districts with primarily Social Security recipients are affected adversely to a greater degree than other "younger" communities. Living cost increases on fixed incomes can be extremely difficult for many.
- Installation of existing waste water systems was paid by the individual benefited community. Why at this point in time is it fair to impose on these communities the cost of newer districts' installation costs? Let the new districts' residents and developers pay for the service infrastructure of their communities.
- The same is true for ongoing maintenance of installed systems. Some communities have funded the ongoing maintenance of their waste water systems for many years, and with this EPCOR proposal, they are being asked to fund THEIR continuing maintenance as well as OTHER districts' maintenance.
- Where is the motivation to be environmentally responsible and to conserve when costs are subsidized? What motivation is there for District 1 to economize if its costs are going to be subsidized by Districts 2, 3, 4, and 5 who have no control on how District 1 manages its waste water?
- With subsidized rates, there is no leverage among the varying districts to work together to reduce usage and unite in opposition to rate increases. EPCOR could propose rate increases to which one district might not object because its rates are being subsidized, to the detriment of the other districts that are bearing a greater share of the rate increase.
- At what point do existing districts have to continue to subsidize newer districts? If EPCOR grows in the future, will existing communities be asked to subsidize the installation and maintenance of the communities in which EPCOR expands its service? Wouldn't it be fairer to have those communities and their developers pay for their infrastructure? Why is EPCOR's expansion a reason to burden existing customers with the cost of EPCOR's expansion? With appropriate

AZ Corporation Commission

October 14, 2016

Page 2

disclosure, EPCOR can inform potential new customers of the true rates to install and maintain waste water systems, and those informed customers can then decide whether or not to move into that community. We should not be held accountable financially for where someone else chooses to domicile.

In our opinion, EPCOR's rate consolidation proposal is unfair, can burden communities that cannot afford to absorb the price to subsidize other communities, does not promote environmental responsibility, and mostly benefits developers and planning commissions by letting them "skate" on infrastructure installation and maintenance costs in order to make their communities more attractive financially. It simply is not fair, and I respectfully request you, our State Commissioners, to reject EPCOR's rate consolidation proposal.

Respectfully,

A handwritten signature in cursive script that reads "Mary A. Giroux".

Mary A. Giroux
10202 N. 105th Avenue
Sun City, AZ 85351